



07-26-23

VIA E-MAIL

Mr. Michael Bolf  
Drinking Water and Environmental Health Division  
Michigan Department of Environment, Great Lakes, and Energy  
State Office Building  
350 Ottawa Avenue NW, Unit 10  
Grand Rapids, MI 49503-2341

**RE: Request for Approval to Conduct Reduced Monitoring for Lead and Copper**

Dear Mr. Bolf:

The City of Benton Harbor ("City") has replaced ALL known lead service lines at this time.

The City has met the lead and copper action levels and maintained the range of values for the water quality parameters for (4) consecutive 6-month periods: July 2021 – July 2023. Therefore, the City is requesting approval to implement reduced monitoring for lead and copper under the provisions of the Michigan Safe Drinking Water Act as follows:

**R 325.10710a Lead and copper in tap water; monitoring requirements, subrule 4(d)(ii)**

A water supply that meets the lead and copper action levels and maintains the range of values for the water quality control parameters reflecting optimal corrosion control treatment specified by the department under R 325.10604f(3)(f) during each of 2 consecutive 6-month monitoring periods may reduce the frequency of monitoring to once each year and reduce the number of lead and copper samples under subrule (3) of this rule if it receives written approval from the department. This sampling shall begin during the calendar year immediately following the end of the second consecutive 6-month monitoring period. The department shall review monitoring, treatment, and other relevant information submitted by the water supply under R 325.10710d, and shall notify the supply in writing when it determines the supply is eligible to commence reduced monitoring under this subrule. The department shall review, and where appropriate, revise its determination when the supply submits new monitoring or treatment data, or when other data relevant to the number and frequency of tap sampling becomes available.

The City has a service population of approximately 8,982. Per R 325.10710a Lead and copper in tap water; monitoring requirements, subrule 3, a total of 20 sample sites would be required for reduced monitoring. Reducing the number of required lead and copper samples from 60 to 20 would allow the City to utilize verified sample sites for the current monitoring period, July – December 2023. The Administrative Rule referenced above specifies that sampling shall begin during the calendar year following the second consecutive 6-month monitoring period during which action levels were met. The City has now met this criteria for **4 consecutive** 6 month monitoring periods. This is twice what the above rule states, and the City has been collecting three times the samples that would be required if approved. We feel that continuing the current sampling schedule places an unnecessary burden on the limited staff of Benton Harbor along with the financial burden of collecting and testing these samples.

Feel free to contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ellis Mitchell". The signature is fluid and cursive, with the first name "Ellis" and last name "Mitchell" clearly distinguishable.

Ellis Mitchell  
City Manager

cc: Ms. Jeni Bolt, EGLE  
Mr. Brandon Onan, EGLE  
Mr. Michael Bolf, EGLE  
Ms. Erin Russell, EGLE  
Mr. Darold Harlan, F&V Operations and Resource Management, Inc.  
Mr. Robert Jones, F&V Operations and Resource Management, Inc.  
Mr. Abul Ahmed, F&V Operations and Resource Management, Inc.